

From: [Kibler, Dottie](#)
To: [Abraham Rubert-Schewel](#); [Emily Gladden](#); [Nichad Davis](#); [elizabeth@emancipatenc.org](#); [Ian Mance](#); [Micheal L. Littlejohn Jr.](#); [Leslie Packer](#); [Michelle Liguori](#); [Benton, Jason R.](#); [Dixon, Jessica C.](#); [Norwood Blanchard](#); [Rod Pettey](#); [Alayna Poole](#)
Cc: [Svendsgaard, Lisabeth](#); [Petty, Amy](#)
Subject: SERVICE BY EMAIL ONLY Irving et al v. City et al, Supplemental Documents to Plaintiffs' First Consolidated Set of Requests
Date: Monday, December 19, 2022 6:21:09 PM

Counsel: The City and Official Capacity Defendants produce additional documents responsive to Plaintiffs' First Consolidated Set of Document Requests, consisting of numbers COR 014748 through COR 015786. We produce these documents subject to the objections previously asserted in our responses and objections dated 9/19/22 and under the same conditions described in our 10/12/22 production. All documents produced are subject to protection under the orders previously entered by the Court. All of the documents produced this evening come from the extraction of the City cellphone previously provided to Omar Abdullah.

Detective R.J. Pike conducted a physical extraction of the cellphone on December 1, 2022. He has conducted a search for email messages on the cellphone using the following agreed search terms:

1. For the period 8-16-2018 through June 13, 2020, search those mailboxes for the following terms: "Aspirin," "Dennis Williams"
2. For the period 5-13-2020 through June 13, 2020, search those mailboxes for the following term: "Burgundy"

COR-014748 is produced as a result of that work. His work concerning the cellphone continues and we will produce documents as his work concludes.

In the meantime, the City Attorney's Office has conducted its own preliminary searches of the December 1, 2022 Cellbrite report based on the agreed search criteria listed above and using an additional phrase "CI Dennis." COR-014749 through COR-015781 are the results of those searches. We also attempted to locate relevant images for May 20-21, 2022 that the search terms did not disclose. The images we located are produced as COR-015782 through 015786.

Addressing the request for cellphone information has been a time-consuming undertaking. After reviewing the materials that we have produced tonight, I would like to talk with you about specific information you need and how to reduce the burden in providing information.

Rod Pettey has in his possession the City cellphones for Det. Gay and Det. Gwinn. He advised me today that he is searching those phones for responsive information. He provided records from Det. Gay's cellphone today at the deposition of Det. Gwinn and I have transmitted those records to the parties.

The only remaining cellphone records are from Det. Rattelade's cellphone and that

phone is in Det. R.J. Pike's possession. Given the information that we have provided tonight from the cellphone previously issued to Mr. Abdullah, I would like to discuss whether a full extraction and analysis is necessary for Det. Rattelade's cellphone.

I also wanted you to know that City IT has concluded its work locating e-mails using the agreed search terms. There are no additional emails; the documents produced to you on December 14, 2022 as a part of the City's sixth supplemental document production are the only e-mails that City IT located.

I also spoke with an RPD IT representative about your request for log information concerning the creation of warrants during the relevant period. I learned that the State of North Carolina changed from the N.C. Aware system in place at times relevant to the *Irving* lawsuit to the new eWarrant system. RPD does not have access to N.C. Aware so there is no log information to produce.

I will shortly send you a SharePoint link to access the documents that we are producing today to meet your request to provide materials by the end of the day today. Should you have any questions, please let Amy and me know. Since Beth is out of town and I am handling the production myself, please let me know if I'm not successful in getting these materials to you. Thanks to all, Dottie

Dorothy V. Kibler
Deputy City Attorney
City of Raleigh
Reception: 919.996.6560
Direct: 919.996.6568
Cell: 919.946.8504
Fax: 919.996.7021
Raleighnc.gov